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June 3, 2022

Hon. Kenneth M. Karas
United State District Judge
United States District Court
300 Quarropas Street
White Plains, NY 10601

MEMO ENDORSED

Re: Chad Stanbro vs. Westchester Medical Center, et al.
Index No: 7:19-cv-10857 (CM)
Companion Action: 7:20-cv-01591 (KMK)

AMENDED LETTER MOTION

Dear Honorable Sir:

This firm represents Westchester Medical Center (WMC) and Dr. John Full, in the above referenced action. I write Jointly on behalf of all defendants (WMC, Dr. Full, Dr. Webber, CO Palou, CO Deal, CO Leonardo, CO Landry, Sgt Torres, and Nurse Pagliaro) to jointly and respectfully request an extension of all defendants' time to file motion in limines, as well as Joint Defenses Jury Instructions and a Verdict Sheet, from June 3rd to June 6th and to modify the existing order as follows:

- Motions, Jury Instructions, and Verdict Sheet due by 6/6/2022. Responses to the Motions, if any, due by 6/14/2022

I have spoken with plaintiff's counsel, Ed Sivin, concerning defendants' request and, while he advised he could not consent, he did not object to the undersigned seeking the court's permission in this regard.

This extension is necessary as all of the defendants are diligently working on their motions and proposed jury verdict sheet and instructions. Although Plaintiff has provided us with his draft proposed verdict sheet and instructions, those papers have required immense editing by the defendants and it is unlikely that the defendants will be able to submit the papers jointly to the court in a final form by the end of today. Mr. Sivin advised the undersigned that he is not in a position to delay his filing and would be filing his papers later today.

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Thank you for your consideration in this regard. Should you have any questions, please contact the undersigned.

Very truly yours,

Claudine Weis (4209)

Claudine Weis

CLW/cl

cc:

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Companion Action: 7:20-cv-01591 (KMK)
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Granted.

The Clerk of Court is directed to file this Order in both related actions (Case Nos. 19-CV-10857 & 20-CV-1591), and terminate the motions at Dkt. Nos. 102 & 103 in Case No. 19-CV-10857 and at Dkt. No. 127 in Case No. 20-CV-1591.

SO ORDERED


KENNETH M. KARAS U.S.D.J.

6/3/22